

June 11, 2019

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, D.C. 20554

**Re: USTelecom Ex Parte Notice, WC Docket No. 10-90, *Connect America Fund*;  
WC Docket No. 11-10, *Modernizing the Form 477 Data Program*; WC Docket  
No. 19-126, *Rural Digital Opportunity Fund***

Dear Ms. Dortch:

On June 7, 2019, I spoke on the phone with Sue McNeil, Associate Bureau Chief in the Wireline Competition Bureau as a follow-up to our meeting about the Rural Digital Opportunity Fund on May 29.<sup>1</sup> I explained USTelecom's position that unserved census blocks tend to be quite scattered, making it difficult and inefficient to design a network to those specifications alone. Further, without the benefit of USTelecom's proposed Broadband Mapping Initiative,<sup>2</sup> a prospective bidder would not be able to determine if the location counts are correct in these unserved census blocks, let alone where exactly the locations are, which makes bidding at scale extremely difficult. The Broadband Mapping Initiative will also allow the Commission to target support to *all* unserved locations.

Please contact me with any questions.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
Mike Saperstein

Vice President, Policy & Advocacy

cc: Sue McNeil

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<sup>1</sup> Letter of Mike Saperstein, VP Policy & Advocacy, USTelecom to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 10-90, 11-10, 19-126 (May 31, 2019).

<sup>2</sup> See, e.g., Letter of B. Lynn Follansbee, VP Law & Policy, USTelecom to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 10-90, 11-10 (Mar. 21, 2019).